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31 January 2021

The Local Plan Team  
LB Richmond upon Thames  
Civic Centre  
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Dear Sir/Madam

**Draft Update of the Local Plan**

We have pleasure in enclosing our comments on your draft update. Our Society has a sub-group of six who have looked at your document comprising an Urban Planner, Architect, two Heritage Experts (both ex-English Heritage), Transport Planner and Civil Engineer. Our comments, which have been arranged in accordance with your sequence of sections, have been considered and approved by our Committee of ten. We apologise that we have not been able to respond using your form.

Please note that our comments on Site Allocation 34 The Stag Brewery may – or may not – change in the course of the next few months when we come to comment on the forthcoming applications due for submission on 7 February. We aim to consult our wider membership on these applications and will revert to you in due course.

With best regards

Tim Catchpole  
Chair

## Local Plan Update: Comments by MESS

### General comments

We note that this draft update of the Local Plan (referred to hereafter as the Update Plan) launches almost immediately into the spatial strategy for the nine distinct areas of the Borough and then covers the Borough-wide policies, whereas the current Local Plan adopted in 2018 sets out the Borough-wide policies first leading to the spatial strategy at the end. We wonder why there has been this change of approach?

The 'batting order' of the Borough-wide policies rightly starts with policies on climate change, energy, flood-risk and water infrastructure and then follows with housing, town centres, local character and design quality, green and blue infrastructure, sustainable travel and the social and community infrastructure. This is a sensible batting order but we fail to understand why the document then concludes with the design process, tall buildings, local environmental impacts and basements – they seem to have been tagged on at the last minute like after-thoughts whereas they should surely belong to the section on local character and design quality, as indeed they do in the current Local Plan.

The plans in the spatial strategy sections need to be clearer and the 'ratings polygon diagrams' from the Urban Design Study consultation of 2021 are poorly presented in an almost illegible series of images. The data would be better presented as tables as the polygons are virtually meaningless to most people who are not academic specialists.

In our comments we have found the text in your supporting document – A Summary of the place-based strategies with site allocations and policies (Dec 2021) – very useful as "it sets out some of the main changes when compared with the adopted Local Plan." We have shown this for each strategy and policy below in italics.

### Spatial Strategy, Place-Based Strategies and Site Allocations

**Policy 1. Living Locally and the 20-minute neighbourhood (strategic):** *new policy setting out overarching approach to achieve living locally, creating environments that focus on ease of active travel and access to public services, taking into account changing high streets and workplaces, and making it clear all development should contribute to the concept.*

We agree with the logic.

**Policy 2. Spatial Strategy: Managing change in the borough (strategic):** *new policy setting out the continued spatial strategy directing higher density development to sites in the town centres or well-connected places, prioritising previously developed land. Emphasis is on promoting green infrastructure and mitigating the impacts of climate change and protecting the borough's environment, local character and heritage assets. Supporting text details the evidence base around future needs and the borough's constraints and capacity for growth.*

We agree with the logic but note that it then leads into the spatial strategies for the nine distinct areas of the Borough and we wonder, as mentioned above, why these should appear upfront and not at the end of the document.

**10 Place-based Strategy for Ham, Petersham & Richmond Park:** *focus on building on identity as a distinct and mixed community, recognising the semi-rural landscape setting, to provide access to*

opportunities and improve active travel. Reflects the adopted Ham & Petersham Neighbourhood Plan (N.B. no mention here of Richmond Park).

Our Society has a particular interest in Richmond Park as a large part of it lies within the boundary of the Parish of Mortlake with East Sheen (see below under strategy 13). Likewise another part of it lies within the Parish of Richmond (strategy 11). We think it illogical for the Park to be associated with Ham & Petersham alone; it should really be considered as a separate area requiring its own place-based strategy.

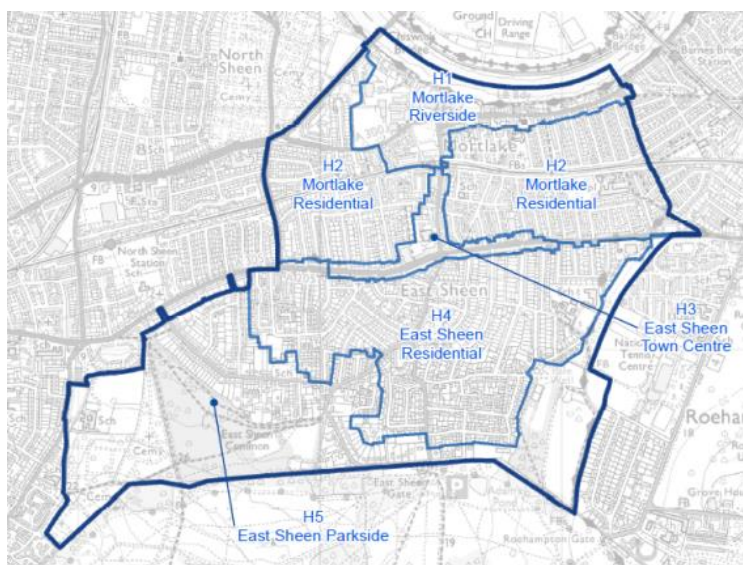
The mention of London's largest Site of Special Scientific Interest requires explanation. It is the one place in the Borough that merits a Geodiversity label – see our comments below on Policy 39.

Mention should be made of the Royal Parks' current strategy for decreasing the number of vehicles within the Park and any initiatives to introduce shuttle buses through the Park with destinations outside the Park.

**13 Place-based Strategy for Mortlake & East Sheen:** *create a new focus to Mortlake by redevelopment of the Stag Brewery site, creating a recreational and living quarter and link to the riverside. Focus on retaining the character of East Sheen, with potential to make Milestone Green the centre.*

We agree with this. However, we have a slight disagreement with your boundary of our area. You describe Mortlake & East Sheen as a 'place' (previously as a 'village') and define its boundary according to the character area boundaries identified in your Urban Design Study (see figure below), whereas our Society has always defined its area as based on the Parish boundary of Mortlake with East Sheen (see figure below alongside). In our view the Parish boundary equates better with the catchment area not only of the shopping centre but also of the cultural quarters (as referred to in your Update Plan) which include our churches, these being used for a variety of cultural events, not just for worship.

It should be noted that the Parish of Mortlake with East Sheen includes the Mortlake Crematorium and its adjacent cemetery and excludes Christ's School and its adjacent cemetery.



We agree with the definitions of character areas H1, H2 and H3 but there seem to be problems with the boundary between H4 and H5. In particular, Martindale and Spencer Gardens on the north side

of Christchurch Road are in character with H4, not H5, and Sheen Mount Primary School is split between both character areas, which makes no sense. This boundary needs refinement.

The area profile does not mention the cemeteries in our area, of which there are several, including their importance as open spaces. Nor does it mention the important archaeological interest on the Brewery site.

We are pleased to see the focus on our town centre including improvement of the public realm and creation of public areas at Milestone Green and elsewhere. However, this needs to be tempered with an appraisal of the air quality in our town centre and what can be done to improve it.

We note your comment on the public realm at Mortlake Station. We have argued several times before that this area needs to be a 'site allocation' (indeed it was such in a previous Local Plan some ten years ago) and are disappointed to see your answer that this is unlikely given the fragmented ownership. This is not true – there is a single ownership, namely Network Rail.

We are pleased to see your mention of the Mortlake Riverside and the Thames Path but would like to have seen some reference to the river's arcadian setting mentioned in the Mayor's recent verdict on the Brewery development.

### **Site Allocations:**

• **Site Allocation 34. Stag Brewery, Lower Richmond Road, Mortlake** – *updated allocation (SA 24), for comprehensive redevelopment for a mix of uses to deliver a new heart for Mortlake, including a new 6-form entry secondary school plus sixth form, residential, employment, commercial – retail, other employment generating uses, health facilities, community and social infrastructure, river-related uses, sport and leisure uses, including retention/reprovision and upgrading of the playing field, with public realm and links to surrounding area and riverside.*

We are pleased to see the reference to the Stag Brewery Planning Brief and the continuation of its 7-storey height limit which has been reinforced in your recent Urban Design Study.

That said, we continue to disagree that "there is a clear need for a new 6-form of entry secondary school plus 6<sup>th</sup> form" replacing the primary school in the Brief, our reasons being as follows:

- There is no demand for the secondary school as primary school numbers have been in steady decline for the last ten years.
- It will threaten the viability of the 6<sup>th</sup> forms at RPA and Christ's School;
- It will deny the possibility of Thomson House Primary School relocating onto the Brewery site from its current two sites which are split by the railway, both sites lacking any open space and one of the sites being exposed to traffic intimidation in Sheen Lane next to the high-risk level crossing;
- It will reduce the land requirement for housing and its affordable component (the primary school would have had a much smaller land requirement);
- It will require the existing playing fields to be all-weathered and equipped with unsightly fencing and floodlights (the primary school would have allowed retention of the existing grass playing fields);
- It will generate large numbers of cyclists and pedestrians encountering problems at the level crossing on Sheen Lane and at the crossing of the heavily trafficked Lower Richmond Road.

We note the statement that "it may be acceptable to re-distribute the designated OOLTI within the site provided that the new open area is equivalent to or improved in terms of quantum, quality and openness." We continue to maintain that the re-distributed OOLTI into a series of courtyards, which

will be overshadowed and will likely become private open spaces in gated communities, represents a failure in terms of both quality and openness.

Mention is made of the Archaeological Priority Area but this needs elaboration. The site includes the suspected remains of both the Archbishop's Palace and Cromwell House.

There is no mention of flood-risk and the need to install storm surge flood mitigation measures to ensure that surrounding areas of Mortlake are protected.

- **Site Allocation 35. Mortlake and Barnes Delivery Office, Mortlake** - *updated allocation (SA 25), for employment or other commercial and retail uses.*

No comment.

- **Site Allocation 36. Telephone Exchange and 172-176 Upper Richmond Road West, East Sheen** - *updated allocation (SA 27), for employment and commercial uses as well as community and social infrastructure, mixed use with housing above and to the rear.*

The guidance should note that planning permission has recently been granted for change of use from a retail warehouse to a gymnasium, now implemented. No further comment except to note that the rear end of the gymnasium site and the closed access to the site off Paynesfield Avenue continue to be derelict and unsightly.

- **Site Allocation 37. Barnes Hospital, East Sheen** - *updated allocation (SA 28), for social and community infrastructure uses, and provision of a new Special Education Needs school. Reflects extant outline permission.*

There is no clear guidance about the height and density of the housing development and what can be accepted in relation to the poor access from South Worple Way. Planning permission has since been granted in outline for 83 housing units which we believe to be the absolute maximum. Any increase in this quantum, as currently proposed, should not be considered.

## **Policies**

### **Theme: Responding to the climate emergency and taking action**

**Policy 3. Tackling the climate emergency (strategic):** *new overarching climate change policy, bringing all the different climate change strands and strengthened requirements together as well as setting out the high level aims and expectations, including net-zero carbon by 2050 and what contribution developments need to make to achieve this.*

Mention could be made of developing plans for centrally sponsored decentralised energy networks (DENS) using ground source or borehole source heat exchangers from under sports pitches and similar open spaces.

Item B7 could include minimising run-off and promoting soakaways, also aquifer use.

**Policy 4: Minimising Greenhouse gas emissions and promoting energy efficiency:** *updated approach (LP20 and LP22) to significantly strengthen the requirements for net-zero carbon, setting out how all developments resulting in 1 or more dwellings have to achieve net-zero, with specific onsite carbon emission reduction requirements. No more gas boilers in new dwellings or new nondomestic development from 2024. To set out a new carbon offset rate of £300/t (as opposed to current price of £95/t).*

Item B2 could include DENs using heat from ground source and borehole source heat exchangers.

**Policy 5. Energy Infrastructure:** *updated and strengthened approach (LP22) in relation to requirements for decentralised energy and maximising opportunities for on-site electricity and heat production from renewable energy sources, with emphasis on non-combustible / non-fossil fuel energy for decentralised energy networks.*

Item B could be modified by adding after “Where networks do not exist, developments should make provision to connect to any future network” the following: “and contribute significantly to its inception within 5 years or by 2030.”

**Policy 6. Sustainable construction standards:** *updated and strengthened approach (LP20 and LP22) in relation to requirements for BREEAM ratings from current ‘excellent’ to ‘outstanding’, together with requirement for BRE Home Quality Mark for new-build residential developments and specific fabric efficiency standards. Retaining existing approach to Sustainable Construction Checklist and maximum water consumption levels.*

### **Water Efficiency**

Para 16.37 about “water stressed” does not square with the observation that the water levels in the major Chalk aquifer under London are rising well above the Victorian era lows caused by over extraction. This aquifer must now be considered a significant water resource for balancing high versus low rainfall years. Of course, the requirement for high standards of water efficiency in new developments should remain.

**Policy 7. Waste and the circular economy:** *updated approach (LP24) in relation to waste and adopting principles of the circular economy, including new specific requirements for Circular Economy Statement and Whole Life-Cycle Carbon assessment.*

No comment.

**Policy 8. Flood risk and sustainable drainage (strategic):** *retaining existing approaches (LP21) in relation to fluvial and tidal flood risk, with strengthened requirements for managing surface water flood risks and sustainable drainage as well as groundwater flood risks, including updated guidance and requirements for basement developments in flood affected areas. Incorporating recommendations from 2020 SFRA, including climate change allowances (use of ‘upper end’ scenarios) and approach to Sequential Test.*

We urge that you include a policy stating that flood-risk areas are protected from storm surges and rising sea levels.

Ideally there needs to be a pre-amble about this issue but you haven’t shown any such pre-ambls throughout the document, so it needs to be the opening paragraph of your supporting text, as follows:

The major and most unpredictable flood risk in the Borough is from storm surges in the North Sea inundating the Thames Estuary. In February 1953 many lives were lost on Canvey Island and the flooding of Barnes, Mortlake and Richmond was severe. Recent research (2021) indicates that the levels could have been up to a metre higher at the Sheerness Tidal Observatory if the storm centre had moved at a slightly lower velocity. If a storm surge occurs in conjunction with spring high tides and heavy, persistent rainfall with high run-off and fluvial flooding then the Environment Agency’s worst case scenario would be exceeded by a metre or more. The Thames Barrier would be overwhelmed and much of London, the underground system and basements would be severely

flooded with consequent loss of life and disruption. With rising sea-levels and more importantly more extreme weather provoked by climate warming, this scenario must be addressed and not swept under the carpet!

In summary the Borough is at risk of flooding from six major factors in order:-

1. Storm surges in the North Sea
2. Tidal flooding
3. Fluvial flooding
4. Surface water run-off
5. Groundwater
6. Sewer capacity overflow

Without a new vastly improved Thames Barrier factor 1 is impossible to mitigate while factors 2 and 3 can be mitigated with higher flood defences. The other three factors are mainly very localised in effect and can be improved with coherent engineering works and maintenance, but they would all three probably exacerbate any major storm surge flooding.

### **Table 16.3 Flood Zones**

A Zone 0 should be added with the same parameters as Zone 1 to take account of the extreme storm surge flooding.

### **Sustainable drainage**

Item H.2.a. This should read 2 l/s per sq metre runoff rate.

### **Table 16.4 Basements in areas of flood-risk**

Flood Zone 1 should be added to Flood Zone 2 and a Flood Zone 0 should be inserted in place of Flood Zone 1 with a note saying "If a basement, basement extension or conversion is acceptable in principle in terms of its location, it must have internal access to a higher floor, and flood resistant and resilient design techniques must be adopted."

## **Theme: Delivering new homes and an affordable borough for all**

**Policy 10. New Housing:** *updated approach (LP34) to reflect London Plan housing target, updated broad locations for future housing and sets out a stepped housing trajectory.*

We note that the housing target for Barnes, Mortlake and East Sheen in the next 10 years has increased from 400-500 in the current plan to 800-900 in the Update Plan. We see this target as being met substantially from the Brewery and Barnes Hospital redevelopments and we firmly believe that any increase beyond this will put a significant strain on our physical and social infrastructure which is already at breaking point.

**Policy 11. Affordable Housing:** *updated approach (LP36) to reflect the London Plan and changes to national policy, including in regard to viability, and the Local Housing Needs Assessment. Sets out that First Homes and a fast track viability threshold approach are not appropriate in the borough context.*

We are pleased to see a definition of affordable housing (not given in the current Local Plan). We note that the split is 70% social rent and 30% intermediate whereas it is currently 80% and 20% respectively, but there is no explanation given as to why this has changed.

**Policy 12. Housing Needs of Different Groups:** *updated approach (LP37) expanded to address specific types of housing for different groups, with emphasis on priority affordable housing needs, and to ensure local needs will be met through the design of proposals and securing details around eligibility and affordability, to accord with strategies for housing, commissioning, health and social care.*

No comment.

**Policy 13. Housing Mix and Standards:** *updated approach (LP34) to accord with the London Plan including in terms of unit sizes and making efficient use of land.*

We note the additional statement that areas within PTAL 3-6 or within 800m of a station or town centre boundary should provide a higher proportion of small units and that for market housing the highest demand is for 2 and 3 beds.

We also note the new mention of the minimum floor to ceiling height being 2.5m but could not find any reference to apartments needing to have more than one view.

**Policy 14. Loss of Housing:** *updated approach (LP38) to reflect the London Plan including in terms of optimising use of land and expecting replacement housing at existing or higher densities.*

We note that this policy now includes a reference to 'embodied carbon and the circular economy' which is sensible.

**Policy 15. Infill and Backland Development:** *updated approach (LP39) to take account of types of brownfield sites where the London Plan expects optimisation for housing delivery, and a balanced approach to protecting garden land, resisting significant loss of garden land, with emphasis on assessing the harm of proposals.*

We note that this policy now includes backgarden development which in Policy LP39 came under a separate heading (39B). Backgarden development is a key issue in our area, in particular 'summerhouses' equipped with water and electricity supplies with potential for becoming offices, granny flats or even air B&B. The policy on backgarden development needs strengthening and we would like to see this remain as a separate section and not be confused with backland.

**Policy 16. Small Sites:** *new policy, to reflect London Plan emphasis and links with Urban Design Study.*

We have seen a number of planning applications recently in our area for the redevelopment of substandard lock-up garages and/or the development at the rear of corner sites with access from side roads. Some of these have been approved and some refused. We would like to see clearer policy guidance on this.

## **Theme: Shaping and supporting our town and local centres as they adapt to changes in the way we shop and respond to the pandemic**

**Policy 17. Supporting our centres and promoting culture:** *continues the existing hierarchy of the centre network (LP25), recognising the importance of smaller centres to Living Locally, and sets a positive approach to repurposing High Streets through adaptation and diversification including leisure and community uses. Acknowledges the significant impact of changes to the use classes. This*



*overall strategic policy seeks to protect existing commercial space and promotes enhancement of the public realm for connecting places.*

We note that East Sheen is designated as a District Centre and that the boundaries of this centre are to remain unchanged. The E-W extent of the centre runs along the Upper Richmond Road West from Wallorton Gardens to Coval Road and the N-S extent along Sheen Lane from Milestone Green to Mortlake station. The key and secondary shopping frontages on the Upper Richmond Road West however are seen (from Appendix 1) to extend from East Sheen Avenue to Coval Road leaving a number of shop frontages and other non-residential frontages outside the secondary frontage limits. These physical limits need to be better-defined taking into account additional features such as footway widths, scope for hard and soft landscaping and opportunities for creating “Centre Gateway” treatments. This is needed given the admitted uncertainties related to the forecasted speed of change evidenced from phase 1 of the Retailing and Leisure Study.

We also note the need to improve wayfinding and the provision of WCs.

**Policy 18. Development in centres:** *continues a town centre first approach (LP25, LP26) directing new major development to within the town centre boundaries, with a focus on the primary shopping area, and appropriate scale development in local centres and Areas of Mixed Use. Support for uses that add to vitality and viability, and that residential can be appropriate on upper floors and peripheries of centres. Links to the vision for each of the centres. Designates Cultural Quarters in Richmond and Twickenham, and recognises cultural clusters in other smaller centres. Seeks inclusive development, flexible provision, adequate servicing/delivery. Acknowledges the significant impact of changes to the use classes.*

We note the intention to create “shop-like” appearances to empty retail premises but frankly consider this to be papering over the problem when far more pro-active initiatives to do with ownership, pricing and Use Class management are warranted. We note the challenges and opportunities involved with Use Class E.

**Policy 19. Managing impacts:** *updates the previous approach (LP26) on over-concentration in light of the impact of changes to the use classes, with emphasis on supporting vibrant uses while managing the impacts, including the mitigation that may be sought.*

We note that HMG is considering the case for making external areas brought into temporary use during the pandemic available permanently. If this transpires then there is the need to designate suitable frontages that are capable of mitigating adverse impacts.

**Policy 20. Local shops and services:** *updates the previous approach (LP26 and LP27) supporting local shops and services, important for Living Locally, and resists the loss of public houses. Acknowledges the significant impact of changes to the use classes.*

We agree with the policy to resist the closure of pubs!

## **Theme: Increasing jobs and helping business to grow and bounce back following the pandemic**

**Policy 21. Protecting the Local Economy:** *continued protection of existing employment floorspace (LP40, LP41, LP42) with a focus on the importance of existing designated employment sites across the borough and our town centres. Acknowledgement of impact of changes to the use classes, and*

*reference to recent Article 4 Direction as this is the policy tool that will be applied. Expects employment-led intensification and all major new development to consider opportunity to include commercial use, given local employment needs and the uncertainty caused by the pandemic. As a strategic policy, mention of the importance of affordable, adaptable workspaces and the Agent of Change principle.*

We note the aim to make the use of office space more efficient but see little about how this will be done particularly in the context of occupational changes accelerated by the pandemic. We note the intended continuation of the Article 4 direction with regard to PDRs to residential use.

**Policy 22. Promoting jobs and our local economy:** *new policy recognises the valued local economy and existing clusters/sectors, and promotes local employment opportunities, drawing out criteria for suitable spaces. Include support for technology, low carbon and the circular economy linking with climate change.*

We welcome the intended support for TV, film studio capacity and river-related/dependent industries.

**Policy 23. Offices:** *strengthens existing approach (LP41) to expect no net loss of office floorspace, while continuing to direct new major office development to the town centres. Acknowledgement of impact of changes to the use classes, renaming Key Office Areas as Key Business Areas (as there is a link with the town and local centres policies above).*

We note the presumption against the loss of office space. It is not clear how the forecast shortfall in office space (100,000 m<sup>2</sup> for the period 2019-2039) and the aim to achieve 40,000 m<sup>2</sup> fit in with post-pandemic uncertainties surrounding demand.

**Policy 24. Industrial land:** *strengthens existing approach (LP 42) to expect no net loss, expecting industrial re-provision to provide suitable space. No longer allowing for mixed use of just residential and replacing industrial land with office floorspace as part of redevelopment proposals as this does not address the need. Acknowledgement of impact of changes to the use classes.*

We note the presumption against the loss of industrial land and the paucity of industrial land in the MESS area. It is interesting to note the reference to the Big Yellow storage unit on the Lower Richmond Road, yet no mention of the potential loss of the Stag Brewery site.

**Policy 25. Affordable, flexible and managed workspace:** *expands on the existing approach (LP41) protecting existing affordable workspace and requiring on all sites providing more than 1,000sqm employment floorspace. Details modern, adaptable affordable workspace that is needed and how this will be secured.*

We agree with the aims set out.

**Policy 26. Visitor economy:** *updated approach (LP43) to reflect London Plan requirements for accessible hotel bedrooms and approach to cultural quarters and clusters in the borough.*

There is some potential for expanding this within the MESS area. This is associated with the river, the Stag site, the Sheen Lane Community Centre, Richmond Park plus the local and passing trade demands for higher quality seating and al fresco areas particularly making use of Milestone Green and the extremely wide pavements along sections of the Upper Richmond Road West, for example adjacent to Connaught Avenue and Paynesfield Avenue. However, any such seating needs to be assessed in terms of exposure to traffic pollution.

**Policy 27. Telecommunications and digital infrastructure:** *updated approach (LP33) recognising the need for enhancing digital infrastructure (reflecting London Plan requirements for new development) while also assessing the potential impacts.*

We note that the new wave of aerial masts is associated with 5G. We have had seven applications for aerial masts in our area in the past two years and none of them have been accompanied by adequate visual impact studies including photomontages. We would like to see this policy make a request that all applications should include such studies. We have been undertaking such studies ourselves in order to assess the impact, but it should be the role of the promoter, not the local community, to do this.

### **Theme: Protecting what is special and improving our areas (heritage and culture)**

**Policy 28. Local character and design quality:** *takes forward existing approach (LP1) into broader strategic policy, linked to Urban Design Study and achieving design quality and various aspects to place-making.*

We note the addition of nine new principles such as the promotion of energy efficiency, urban greening, etc. However, we also note that one phrase in LP1 seems to have disappeared, viz: “gated developments will not be permitted” – admittedly in brackets. We wonder why? Is it because this has been proved to be unrealistic?

**Policy 29. Designated heritage assets:** *minor updates to existing approach (LP3) including in response to climate change and latest on updating Conservation Area Appraisals.*

We note that your Section B duplicates Section A.9. One of these has to be deleted.

**Policy 30. Non-designated heritage assets:** *minor updates to existing approach (LP4) including reference to locally listed historic parks and gardens.*

We note the inclusion of Buildings of Townscape Merit... and other local historic features. We are pleased that our historic walls dating from the 18<sup>th</sup> and 19<sup>th</sup> centuries have recently been designated as BTMs but there are numerous other walls not included and we hope that they will come to be recognised as ‘other historic features.’

We also note that the applicants’ requirements have been removed from the policy statement and been transferred to the supporting text. This is logical.

**Policy 31. Views and vistas:** *minor updates to existing approach (LP5) including links with Urban Design Study and forthcoming additional local views to be identified (for the Policies Map).*

No comment but we look forward to consultation on the additional views being identified.

**Policy 32. Royal Botanic Gardens, Kew World Heritage Site:** *minor updates to existing approach (LP6).*

No comment.

**Policy 33. Archaeology:** *minor updates to existing approach (LP7) to reflect forthcoming updated ‘tiered’ APAs.*

No comment but we insist there is sufficient time allowed for the necessary archaeological field investigations on the Brewery site.

**Theme: Increasing biodiversity and the quality of our green and blue spaces, and greening the borough**

**Policy 34. Green and Blue Infrastructure:** *updates the existing policy approach (LP12) to protect and enhance the multi-functional green infrastructure, as well as the blue infrastructure network, ensuring it is maintained and sets the strategic links with its role related to biodiversity, urban greening and climate change as well as outreach and education.*

We note this policy excludes the public open space hierarchy listed in LP12 and we wonder why?

**Policy 35. Green Belt, Metropolitan Open Land and Local Green Space:** *continues the strong protection of the Borough's designated open spaces (LP13) and adds into policy the encouragement for improvements or enhancements to landscape quality (including visual amenity), biodiversity (including delivering biodiversity net gain) or accessibility. Policies Map changes suggested in light of evidence base (i.e. removal of one site from MOL, with two other minor changes to MOL boundaries; and 6 proposed new Local Green Space designations).*

There is no mention here of the importance of playing fields and other Green Belt land as flood storage areas. On the Brewery site, for example, the playing fields are in Flood Zones 2 and 3 and should remain green. Incidentally we are aware that the Mortlake Brewery Community Group applied to the Council to have these playing fields designated as Green Space but that there has been no positive response and we would like to know the reason.

**Policy 36. Other Open Land of Townscape Importance (OOLTI):** *continues the protection of designated OOLTI (LP14) and while recognising the changes to PD rights, provides opportunity to encourage measures to restore spaces in terms of their quality, character and biodiversity net gain. Policies Map changes suggested in light of evidence base (i.e. adding one new site and removing duplication of OOLTI designation on one site).*

No comment but, as mentioned elsewhere, we are concerned about the re-provision of the OOLTI on the Brewery site as we question the quality, character and biodiversity of the reprovisioned space.

**Policy 37. Public open space, play, sport and recreation:** *updates existing approach (LP31) recognising importance of requirement to provide open spaces on-site as part of new development, and links to biodiversity and climate change, and to refer to the GLA's child yield calculator; updated policy to also refer to relocation of playing fields. Policies Map changes proposed in light of new Public Open Space deficiency mapping to be undertaken.*

No comment.

**Policy 38. Urban Greening:** *new policy to set approach to reflect London Plan Urban Greening Factor on major developments, incorporating the existing policy approach to green roofs and walls (LP17), and expecting incorporation of urban greening on all small sites, recognising wider links to biodiversity and climate change.*

No comment.

**Policy 39. Biodiversity and Geodiversity:** *continues protecting the borough's biodiversity (LP15), with updated mitigation hierarchies and increased emphasis on including the connection between habitats and importance of wildlife / ecological corridors, with a specific policy requirement for at least 20% contribution to delivering measurable biodiversity net gain. Policies Map changes*

*suggested in light of evidence base, i.e. changing existing Other Site of Nature Importance (OSNI) to Site of Importance for Nature Conservation (SINC), amending and adding to existing sites as well as identifying new sites for protection.*

There is very little mention here of geodiversity. There is a proposal to include the landforms and Pleistocene deposits of Richmond Park into a new Geodiversity area. In the annals of The Geological Society of London, a lecture titled The Thames Through Time, a Burlington House lecture, held at the Geological Society on 20 September 2011, it is reported: “the river has laid down a stacked ‘staircase’ of terrace sediments that form one of the most important archives of Pleistocene environmental change anywhere in the world.”

**Policy 40. Rivers and river corridors:** *maintains the protection of the historic, environmental and natural qualities of the borough’s water bodies (LP18). Promotes public access and protects river related industry and water dependent uses.*

We are pleased to see reference made to the Thames Policy Area and to the special character of the reach set out in the Thames Landscape Strategy and Thames Strategy. The latter should read ‘Thames Strategy (Kew to Chelsea)’. We would be interested to know what the Local Plan has to say about the GLA’s Green Grid Study (2016) which showed the whole section of the River from Hampton Court to the Wandsworth border as ‘Arcadia’.

Para 21.84 should include the following: “These river valleys and the tributary streams and their valleys concentrate the groundwater hydraulic flow systems over large areas depending on the porosity and permeability of the soils and subsurface. Where they intersect particular aquifers can be a zone of particular sensitivity to pollution, flood risk, biota contamination and other effects. These intersection zones need careful mapping and control. Any building work, especially basements, that may puncture a sealed aquifer to allow groundwater ingress must be tightly controlled.”

Para 21.87 about the network of linked waterways should include the following: “However, they also create barriers to movement and need expensive bridges and ferries to solve the problem.”

**Policy 41. Moorings and floating structures:** *clarification (LP19) to improve and protect the open character, views and heritage of the waterways, and emphasise that new moored vessels would only be supported for river-related uses.*

No comment.

**Policy 42. Trees, Woodland and Landscape:** *continues the protection of existing trees and requirements for new trees in development (LP16), with increased emphasis on the broader value of trees and links with biodiversity, air quality and climate change mitigation and adaptation.*

No comment.

**Policy 43. Floodlighting and other external artificial lighting:** *continues policy approach (LP9) considering the demonstrable harm of floodlighting and the need to balance with positive benefits, including recognising potential for positive benefits around safety/security.*

No comment.

## **Theme: Improving design, delivering beautiful buildings and high-quality places**

**Policy 44. Design process:** *new policy to reflect the Government and London Plan emphasis on design-led approach, setting out the tools to assess good design through the planning process including the role of design review.*

This new policy covers the optimizing of site capacity through the design-led approach, the content of the Design and Access Statement, the pre-app advice, design review panels, design codes, etc. This has come to replace the density matrix which has been used in all London Plans until now.

There seem to be two issues here: optimizing capacity and efficient use of land through a design-led approach, and the quality of design itself. A design-led approach to good place-making should address function and aesthetics, and the latter is inevitably subjective, though clearly underpinned by policy and guidance, and by the Urban Design Study. It is good to see the Design Review Panel formally included as part of the process. This would sit better following Local Character and Design Quality.

As mentioned above, we are not sure why this policy has appeared here at the end and not in the section on Local Character and Design Quality.

**Policy 45. Tall and Mid-Rise Building Zones:** *updated policy approach (LP2) to respond to the London Plan requirements and links with the Urban Design Study identifying tall and mid-rise zones.*

We note the identification of tall building zones, a more detailed coverage of the visual impacts and spatial hierarchy; also mid-rise building zones both related to, and unrelated to, the tall building zones.

Again, as mentioned above, we are not sure why this policy has appeared here at the end and not in the section on Local Character and Design Quality, as it does in the current Local Plan.

**Policy 46. Amenity and living conditions:** *updated policy approach (LP8) particularly recognising London Plan approach to mitigating design features to ensure privacy.*

Again, this could likewise sit better in the section on Local Character and Design Quality.

## **Theme: Reducing the need to travel and improving the choices for more sustainable travel**

**Policy 47. Sustainable travel choices:** *updates existing policy (LP44) to reflect the London Plan, Mayor's Transport Strategy and the Council's Active Travel Strategy. Increases emphasis on walking and cycling for short journeys, inclusive mobility and assessing the impact of developments on the road network - using a threshold approach linked to development size as to whether a separate Transport Statement or Transport Assessment is required for different types of uses.*

We support these policies and note that they are well matched with those promoted by TfL. However, we note that the published evidence base (studies completed and planned) do not include any Borough-based transport studies. We note that developments that would generate high volumes of trips should be focused in PTAL areas 4-6 unless mitigated by bus service improvements. This highlights some of the problems arising from the potential development of the Stag Brewery site.

We note from para. 23.12 that safe networks should be created for pedestrians and cyclists and note that this clearly conflicts with the continuing deterioration of safety conditions being allowed around Mortlake Station and the Council's stance on the provision of local schools.

We note that the policy in LP44 about protecting local filling stations has been omitted. Are we expecting filling stations to be phased out as more cars become electric? Where will tyre pumps and car wash facilities be located in the future? This surely needs to be addressed. It should be noted that we have only two filling stations in our area and that one of them is listed Grade II. Will it soon become a listed building under threat?

**Policy 48. Vehicular Parking, Cycle Parking, Servicing and Construction Logistics Management:** *updates existing policy (LP45) to reflect London Plan vehicle and cycle parking standards. Adopts a threshold approach linked to development size for whether future occupants will be excluded from a CPZ, for when an on-street vehicular parking stress survey is needed, and for when a construction management plan is required. Includes private vehicular crossovers to a former front garden, carfree development, and car clubs.*

We support these policies.

### **Theme: Securing new social and community infrastructure to support a growing population**

**Policy 49. Social and Community Infrastructure:** *continues existing approach (LP29) to ensure adequate provision of community services and facilities, protecting existing sites and requiring new provision to be inclusive and adaptable, to accord with Living Locally. A new criterion allows for a change of use to wholly affordable housing without the need to explore and market for alternative social infrastructure use. Acknowledgement of impact of changes to the use classes.*

No comment.

**Policy 50. Education and Training:** *updated approach (LP29) with additional detail regarding provision of childcare places, and to involve AfC in discussions. For promoting local employment opportunities, details updated to reflect adopted Planning Obligations SPD and circumstances when a financial contribution e.g. to Work Match may be accepted. Acknowledgement of impact of changes to the use classes.*

No comment.

### **Theme: Creating safe, healthy and inclusive communities**

**Policy 51. Health and Wellbeing:** *updated approach (LP30) to reflect health priorities and future infrastructure needs, such as space for social prescribing, emphasis on inclusive access, dementia-friendly environments, and public toilets and drinking water. Reflects the London Plan restrictive approach to takeaways. Links with related health plans and strategies, move to integrated care systems. Acknowledgement of impact of changes to the use classes.*

No comment.

**Policy 52. Allotments and food growing spaces:** *continues existing approach (LP32), protecting existing allotments and supporting space for food growing.*

No comment.

**Policy 53. Local Environmental impacts:** *continues to seek to minimise adverse effects of development (LP10) and protect amenity of exiting occupiers. Now includes agent of change principles.*

As mentioned above, this policy would sit better in the section on Local Character and Design Quality.

**Policy 54. Basements and subterranean developments:** *update of existing approach (LP11), to reflect the policy approach to flood risk and sustainable drainage in terms of dealing with basements in flood affected areas assessing throughflow and groundwater and setting out where Basement Impact Assessments are required.*

Item B.5 needs to be modified to: “demonstrate that the scheme will not *puncture or degrade a sealed or isolated aquifer* or increase or otherwise exacerbate flood risk.”

As mentioned above, this policy would likewise sit better in the section on Local Character and Design Quality.

### **Delivery and Monitoring**

**Policy 55. Delivery and Monitoring:** *new policy, to outline approach to delivery through partnership working, securing planning obligations, and enforcement and monitoring.*

No comment.

## **Schedule of Sites not taken forward as Site Allocations**

### **Mortlake Station area**

We note with concern that the Mortlake station area is now excluded since its “fragmented ownership means that it is unlikely to come forward as a comprehensive site or be deliverable”. We do not agree with this. The station area is a dangerous and unwelcoming area. Much of the land that holds the key to a comprehensive improvement is owned by Network Rail and is let on short leases.

### **Richmond Park Academy and Christ’s School**

We note with concern the Council’s statement that the Stag Brewery Site Allocation is taken forward in the draft Local Plan and still includes a new 6-form entry secondary school in line with the Council’s School Place Planning Strategy. We disagree with this element of the site allocation for reasons given above.